

CLARE E. CONNORS 7936

Attorney General of Hawaii

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Attorneys for Defendant

CLARE E. CONNORS, in her

Official Capacity as the Attorney

General of the State of Hawaii

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

TODD YUKUTAKE and DAVID
KIKUKAWA,

Plaintiffs,

vs.

CLARE E. CONNORS, in her
Official Capacity as the Attorney
General of the State of Hawaii and the
CITY and COUNTY OF
HONOLULU,

Defendants.

CIVIL NO. 19-00578 JMS-RT

DEFENDANT CLARE E. CONNORS,
IN HER OFFICIAL CAPACITY AS
THE ATTORNEY GENERAL OF THE
STATE OF HAWAII'S INITIAL
DISCLOSURES; CERTIFICATE OF
SERVICE

No Trial Date

DEFENDANT CLARE E. CONNORS, IN HER OFFICIAL CAPACITY
AS THE ATTORNEY GENERAL OF THE STATE OF HAWAII'S
INITIAL DISCLOSURES

Defendant Clare E. Connors, in her Official Capacity as the Attorney General of the State of Hawaii, by and through her attorneys, Caron M. Inagaki and Kendall J. Moser, Deputy Attorneys General, hereby submits her Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

I. INDIVIDUALS WITH DISCOVERABLE INFORMATION

To date, the Attorney General is unaware of anyone from the State of Hawaii who has discoverable information regarding the issues raised by the Plaintiffs in their Verified Complaint for Declaratory and Injunctive Relief.

II. DOCUMENTS AND THINGS

The Attorney General will make the relevant documents and things in her possession, custody, or control, if any, available to the parties at a mutually agreeable time and place.

III. DAMAGES

The Attorney General is not seeking damages other than the costs of suit.

IV. INSURANCE

The State of Hawaii is self-insured to \$5,000,000.00 and has excess coverage above that amount.

DATED: Honolulu, Hawaii, December 20, 2019.

STATE OF HAWAII

CLARE E. CONNORS
Attorney General
State of Hawaii

/s/ Kendall J. Moser
KENDALL J. MOSER
Deputy Attorney General

Attorney for Defendant
CLARE E. CONNORS, in her
Official Capacity as the Attorney
General of the State of Hawaii